

---

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

---

AR15.Com LLC,

Plaintiff,

*versus*

DENNIS MURRAY & ILANA MURRAY

Defendants.

§  
§  
§  
§  
§  
§  
§  
§

**Civil Action 4:14-cv-1623**

## **Motion For Default Judgment And Permanent Injunction (Pursuant to Fed. R. Civ. P. 55(b)(2))**

1. Pursuant to Fed. R. Civ. P. 55(b)(2), plaintiff requests entry of default judgment against the defendants.
2. Defendant Dennis Murray was served with the complaint on July 27, 2014, and accepted service for his wife, Ilana Murray, the other defendant. (See the attached Exhibit A.)
3. On August 21, 2014, the undersigned attorney sent an email to Mr. Murray, informing him that he had missed his deadline to file an answer to the complaint, and inviting him to consider signing an attached agreed injunction. (See the attached Exhibit B.)
4. On September 3, 2014, defendant Dennis Murray sent the undersigned an email, responding to the August 21 email, stating, "I've just received this email and I am reviewing it. I'll get back to you shortly." (See the attached Exhibit C.)
5. As of this date, the undersigned has not received any form of communication from either defendant, since the promise made by Mr. Murray on September 3.

6. Under penalty of perjury, the undersigned states that all of the following are true and accurate: (a) the facts recited in this motion, and (b) the attached exhibits.
7. Plaintiff respectfully requests that the Court enter the attached proposed final judgment and permanent injunction.

Respectfully submitted,



---

Tim Headley  
Attorney-in-Charge for AR15.Com LLC  
State Bar No. 09325210  
Southern District Bar No. 1003  
7941 Katy Freeway, Suite 506  
Houston, TX 77024-1924  
[tim@headleyiplaw.com](mailto:tim@headleyiplaw.com)  
[www.headleyiplaw.com](http://www.headleyiplaw.com)  
Telephone: 713-467-8500  
Telecopier: 713-467-8501

## Certificate Of Service

I certify that a copy of the foregoing document was e-mailed to the defendants on September 12, 2014, to the following address:

Dennis & Ilana Murray  
1702 Harvest Creek Way  
Fernley, NV 89408  
Email: [dennis@handmadebydroids.com](mailto:dennis@handmadebydroids.com)



Tim Headley  
Attorney-in-Charge for AR15.Com LLC